

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

IN RE:	§	
	§	
THE GATEWAY VENTURES, LLC,	§	CASE NO 21-30071-hcm
	§	Chapter 11
	§	
Debtor.	§	
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	§	
WESTAR INVESTORS GROUP, LLC,	§	
SUHAIL BAWA and SALEEM MAKANI,	§	
	§	
Plaintiffs,	§	
	§	
V	§	Adversary No. 21-03009-hcm
	§	
THE GATEWAY VENTURES, LLC,	§	
PDG PRESTIGE, INC., MICHAEL	§	
DIXSON, SURESH KUMAR, and	§	
BANKIM BHATT,	§	
	§	
Defendants	§	
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**UNOPPOSED MOTION FOR LEAVE TO FILE MICHAEL DIXSON'S
ANSWER TO CERTAIN CROSS CLAIMS SURESH KUMAR**

COMES NOW, Michael Dixon ("Dixon") pursuant to Local Rule 7007, and files his *Unopposed Motion for Leave to File Michael Dixon's Answer to Certain Cross Claims Suresh Kumar*, regarding certain cross claims asserted by Suresh Kumar ("Kumar") against Dixon, and would respectfully show the Court as follows:

I. PARTIES

1. Kumar and Dixon previously had stipulated (along with The Gateway Ventures LLC and PDG Prestige Inc.) to an answer extension during the confirmation process in the underlying Chapter 11 bankruptcy case, which date has since lapsed.

2. The proposed form of answer is attached hereto as **Exhibit "A"**.

3. Kumar does not oppose the filing of an answer by Dixon concurrently with the filing of this Motion.

4. The undersigned understands that the previously awaited agreed motion to dismiss the claims between Kumar and The Gateway Ventures LLC and PDG Prestige Inc. will be forthcoming very shortly.

5. A proposed form of order accompanies this Motion and is incorporated by reference herein.

WHEREFORE, Michael Dixon respectfully requests that the Court grant the Motion as set forth above and any further relief to which he may be entitled.

MARTIN & LUTZ, P.C.

By: /s/ David Lutz

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ATTORNEYS FOR
MICHAEL DIXSON

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served upon all registered ECF users in this case on December 8, 2021 as shown in the list below.

/s/ David Lutz

One of Counsel

21-03009-hcm Notice will be electronically mailed to:

Jeff Carruth on behalf of Cross Defendant PDG Prestige, Inc.
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Jeff Carruth on behalf of Cross Defendant The Gateway Ventures, LLC
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